Case 1:11-cr-00623-DLI Document 84 Filed 09/20/14 Page 1 of 1 PageID #: 596

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BY ECF

September 20, 2014

The Honorable John Gleeson United States District Judge Eastern District of New York 225 Cadman Plaza East Brooklyn, NY 11201

> Re: United States v. Agron Hasbajrami Criminal Docket No. 11-cr-623 (JG)

Civil Docket No. 13-cv-6852 (JG)

Dear Judge Gleeson:

We write pursuant to the Court's order issued on September 12, 2014, directing counsel to confer with our client and determine if he intends to ask for permission to withdraw his guilty plea in light of resent disclosures made by the government.

Counsel met with our client, Agron Hasbajrami, along with and Albanian interpreter, one final time on September 18, 2014. After discussing the matter, Mr. Hasbajrami, against the advice of counsel, has authorized us to advise the Court that he intends to ask to have his plea withdrawn.

Thank you for your consideration in this matter.

Respectfully submitted,

Steve Gisson

Steve Zissou Michael K. Bachrach Counsel for Agron Hasbajrami

cc: Seth Ducharme, AUSA